
UNITED STATES DISTRICT COURT
District of Arizona

In the Matter of the Search of:

SUBJECT PARCEL: One USPS Ready Post brown cardboard box bearing USPS tracking number EI 378755342 US, addressed to "Jessica Shultz, 32 E harbor highlands dr Duluth, mn 55805" with a return address of "Jose flores, 6318 n 65 Dr Glendale, AZ 85301 #213". It is a USPS Ready Post brown cardboard box measuring approximately 15" x 12" x 10" weighing approximately 6 pound and 8 ounces; postmarked May 26, 2022; and bearing \$110.05 in postage.

SEARCH WARRANT

Case Number: 22-9180 MB

TO: Kevin Vanderwood and any Authorized Officer of the United States
Affidavit having been made before me by Affiant, Kevin Vanderwood, TASK FORCE OFFICER UNITED STATES POSTAL INSPECTOR, on the premises known as:

SUBJECT PARCEL: One USPS Ready Post brown cardboard box bearing USPS tracking number EI 378755342 US, addressed to "Jessica Shultz, 32 E harbor highlands dr Duluth, mn 55805" with a return address of "Jose flores, 6318 n 65 Dr Glendale, AZ 85301 #213". It is a USPS Ready Post brown cardboard box measuring approximately 15" x 12" x 10" weighing approximately 6 pound and 8 ounces; postmarked May 26, 2022; and bearing \$110.05 in postage.

in the District of Arizona there is now concealed certain property, namely, CONTROLLED SUBSTANCES AND/OR U.S. CURRENCY OR DOCUMENTS RELATING TO THE DISTRIBUTION OF CONTROLLED SUBSTANCES THROUGH THE UNITED STATES MAIL, IN VIOLATION OF TITLE 18 UNITED STATES CODE, SECTION 1956(h) AND TITLE 21, UNITED STATES CODE, SECTIONS 841(a)(1), 843(b) and 846, AS EVIDENCE OF SAID VIOLATIONS.

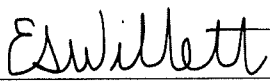
I am satisfied that the Affidavit establishes probable cause to believe that the property so described is now concealed on the premises above-described and establishes grounds for the issuance of this warrant.

YOU ARE HEREBY COMMANDED to search on or before 6/10/2022 (Date)
(not to exceed 14 days) the premises named above for the property specified, serving this warrant and making the search in the daytime (6:00 a.m. to 10:00 p.m.), if the property be found there to seize same, leaving a copy of this warrant and receipt for the property taken, and to prepare a written inventory of the property seized and promptly return this warrant to any United States Magistrate Judge, District of Arizona as required by law.

5/27/2022@4:02pm
Date and Time Issued

at Phoenix, Arizona
City and State

HONORABLE
UNITED STATES MAGISTRATE JUDGE
Name and Title of Judicial Officer


Signature of Judicial Officer

UNITED STATES DISTRICT COURT
District of Arizona

In the Matter of the Search of:

SUBJECT PARCEL: One USPS Ready Post brown cardboard box bearing USPS tracking number EI 378755342 US, addressed to "Jessica Shultz, 32 E harbor highlands dr Duluth, mn 55805" with a return address of "Jose flores, 6318 n 65 Dr Glendale, AZ 85301 #213". It is a USPS Ready Post brown cardboard box measuring approximately 15" x 12" x 10" weighing approximately 6 pound and 8 ounces; postmarked May 26, 2022; and bearing \$110.05 in postage.

**APPLICATION AND AFFIDAVIT
FOR SEARCH WARRANT**

Case Number: 22-9180 MB

I, Kevin Vanderwood, being duly sworn, depose and state as follows:

I am a Task Force Officer with the UNITED STATES POSTAL INSPECTION SERVICE and have reason to believe that on the premises known as:

SUBJECT PARCEL: One USPS Ready Post brown cardboard box bearing USPS tracking number EI 378755342 US, addressed to "Jessica Shultz, 32 E harbor highlands dr Duluth, mn 55805" with a return address of "Jose flores, 6318 n 65 Dr Glendale, AZ 85301 #213". It is a USPS Ready Post brown cardboard box measuring approximately 15" x 12" x 10" weighing approximately 6 pound and 8 ounces; postmarked May 26, 2022; and bearing \$110.05 in postage.

in the District of Arizona there is now concealed certain property, namely, CONTROLLED SUBSTANCES AND/OR U.S. CURRENCY OR DOCUMENTS RELATING TO THE DISTRIBUTION OF CONTROLLED SUBSTANCES THROUGH THE UNITED STATES MAIL, which is CONTRABAND, THE FRUITS OF CRIME, OR THINGS OTHERWISE CRIMINALLY POSSESSED,

in violation of Title 18, United States Code, Section 1956(h) and Title 21, United States Code, Sections 841(a)(1), 843(b) and 846. The facts to support the issuance of a Search Warrant are as follows:

SEE ATTACHED AFFIDAVIT OF Kevin Vanderwood, WHICH IS MADE A PART HEREOF.

Authorized by AUSA Bruce R. Van Baren

BRUCE VAN BAREN
Digitally signed by BRUCE VAN BAREN
Date: 2022.05.27 11:12:23 -0700

Sworn telephonically and subscribed electronically.

5/27/2022@4:02pm

Date

HONORABLE
UNITED STATES MAGISTRATE JUDGE

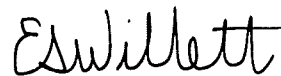
Name and Title of Judicial Officer

TFO Kevin
Vanderwood

Digitally signed by TFO Kevin
Vanderwood
Date: 2022.05.27 11:29:24 -0700

Signature of Affiant – Kevin Vanderwood

at Phoenix, Arizona
City and State



Signature of Judicial Officer

AFFIDAVIT AND STATEMENT OF PROBABLE CAUSE

I, Kevin Vanderwood, being duly sworn, hereby depose and state as follows:

1. I am a Task Force Officer with U.S. Postal Inspection Service and have been since August 2021. I have been a law enforcement officer for over 19 years, I am a graduate of the Arizona Law Enforcement Academy and completed an updated U.S. Postal Inspection Service Task Force Officer training in August of 2021 which included training in the investigation of narcotics trafficking via the U.S. Mail. I am currently assigned to the Phoenix Division, specifically to work Contraband Interdiction and Investigations (CI2) in Arizona, which is responsible for investigating narcotics violations involving the United States Mail. My responsibilities include the detection and prevention of the transportation of controlled substances through the U.S. Mail. Part of my training as a Task Force Officer included narcotics investigative techniques, chemical field-testing, and training in the identification and detection of controlled substances being transported in the U.S. Mail.

2. I have assisted on narcotics investigations of individuals for violations of Title 18, United States Code, Section 1956(h) (Conspiracy to Commit Money Laundering), and Title 21, United States Code, Sections 841(a)(1) (Possession with Intent to Distribute a Controlled Substance), 843(b) (Use of a Communication Facility to Facilitate the Distribution of a Controlled Substance), and 846 (Conspiracy to Possess with Intent to Distribute a Controlled Substance). The facts and information contained in this Affidavit are based on my training and experience, or that of other Postal Inspectors and law enforcement officers involved in this investigation as described below.

3. This Affidavit is made in support of an application for a search warrant for one United States Postal Service (USPS) Priority Mail Express parcel (referred to hereafter as the “**SUBJECT PARCEL**”). **Based on a positive alert by a narcotics-detecting canine, I believe the SUBJECT PARCEL contains controlled substance(s) or proceeds from the sale of controlled substances.** However, because the purpose of this affidavit is merely to establish probable cause for the issuance of a search warrant, this affidavit does not contain all my knowledge regarding the **SUBJECT PARCEL**.

4. The **SUBJECT PARCEL** is further described as follows: One USPS Ready Post brown cardboard box bearing USPS tracking number EI 378755342 US, addressed to “Jessica Shultz, 32 E harbor highlands dr Duluth, mn 55805” with a return address of “Jose flores, 6318 n 65 Dr Glendale, AZ 85301 #213”. It is a USPS Ready Post brown cardboard box measuring approximately 15” x 12” x 10” weighing approximately 6 pound and 8 ounces; postmarked May 26, 2022; and bearing \$110.05 in postage.

BACKGROUND

5. From my training and experience, as well as the training and experience of Postal Inspectors, I am aware that the USPS mail system is frequently used to transport controlled substances and/or proceeds from the sale of controlled substances to areas throughout the United States. I also know that drug traffickers prefer mail/delivery services such as Priority Mail Express and Priority Mail because of their reliability and the ability to track the article’s progress to the intended delivery point.

6. Based on my training and experience regarding Priority Mail Express operations, I am aware that the Priority Mail Express service was designed primarily to fit

the needs of businesses by providing overnight delivery for time-sensitive materials. Moreover, based on my training and experience, I am aware that business mailings often: (a) contain typewritten labels; (b) are addressed to and/or from a business; (c) are contained within flat cardboard mailers; and (d) weigh less than eight ounces. In addition, USPS developed corporate charge accounts to avoid time-consuming cash payments by businesses for business mailings.

7. Based on my training and experience, I am aware that the Priority Mail service was created as a less expensive alternative to Priority Mail Express overnight delivery, but designed to provide quicker, more reliable service than standard First-Class Mail. Whereas a customer mailing an article via Priority Mail Express expects next-day service, a customer who mails an article via Priority Mail can expect two-to-three-day delivery service. The USPS also provides a tracking service, which allows the customer to track the parcel and confirm delivery through a USPS tracking number.

8. Based on my training and experience regarding Priority Mail operations, I am aware that the majority of Priority Mail mailings are business mailings. Businesses have found that Priority Mail is a significantly less expensive method of mailing than Priority Mail Express, particularly when next-day service is not a requirement. I also know that similar to Priority Mail Express, Priority Mail business mailings tend to be smaller, lighter mailings, and on average, weigh less than two pounds. Examples of the typical types of business mailings conducted via Priority Mail include books, clothing, pharmaceuticals, and consumer goods purchased from online retailers.

9. From my training, personal experience, and the collective experiences related to me by Postal Inspectors who specialize in investigations relating to the mailing of controlled substances and proceeds from the sale of controlled substances, I am aware that Arizona is a source location for controlled substances based on its close proximity to the border between the United States and Mexico. As such, controlled substances are frequently transported from Arizona via USPS, and proceeds from the sale of controlled substances are frequently returned to Arizona via USPS.

10. Based on my training and experience regarding the use of Priority Mail Express and Priority Mail to transport-controlled substances and/or the proceeds from the sale of controlled substances, I am aware these parcels usually contain some or all of the following characteristics:

- a. The parcel contains a label with handwritten address information and is addressed from one individual to another individual.
- b. The handwritten label on the parcel does not contain a business account number, thereby indicating that the sender likely paid cash.
- c. The parcel is heavier than the typical mailing, often weighing more than eight ounces for Priority Mail Express, and two pounds for Priority Mail.
- d. The parcel either: (a) was destined for an area known to be a frequent destination point for controlled substances, having been mailed from an area known to be a source area for controlled substances; or (b) originated from an area known to be a frequent origination point for proceeds from

the sale of controlled substances, having been mailed to an area known to be a destination area for proceeds from the sale of controlled substances.

11. Priority Mail Express and Priority Mail parcels found to meet any or all of the characteristics described above are often further scrutinized by Postal Inspectors and Task Force Officers through address verifications and an examination by a trained narcotics-detecting canine.

RELEVANT FACTS PERTAINING TO THE SUBJECT PARCEL

12. On May 26, 2022, I identified and profiled the **SUBJECT PARCEL** at the Maryvale Post Office located at 4415 N. Maryvale Parkway Phoenix, AZ 85031 being mailed to an address in Duluth, MN. USPIS investigators investigated the characteristics of the **SUBJECT PARCEL** and believed it warranted further investigation.

13. Upon physical examination of the **SUBJECT PARCEL**, the **SUBJECT PARCEL** met some of the characteristics listed in Paragraph 10 above. Specifically, 1) the **SUBJECT PARCEL** bears handwritten label information addressed from one individual to another individual, 2) the **SUBJECT PARCEL** weighs approximately 6 pounds and 8 ounces, 3) the **SUBJECT PARCEL** was destined for an area known to be a frequent destination point for controlled substances, having been mailed from an area known to be a source area for controlled substances, and 4) the postage charge for the **SUBJECT PARCEL** had been paid in cash. Based on my training, experience, and the collective experiences related to me by Postal Inspectors who specialize in investigations relating to the mailing of controlled substances and proceeds from the sale of controlled substances, I am aware Arizona is frequently a source location for controlled substances

which are mailed to Minnesota, and proceeds from the sale of controlled substances are frequently returned to Arizona from Minnesota via USPS.

14. A database query was conducted regarding the names and addresses for the **SUBJECT PARCEL** in Consolidated Lead Evaluation and Reporting (CLEAR), a law enforcement database accessible to your Affiant. CLEAR associates address and telephone numbers to individuals and business entities. The CLEAR database is created from credit reports, law enforcement reports, utility records, and other public records.

15. Through the CLEAR database query, investigators learned the delivery address for the **SUBJECT PARCEL** (32 E Harbor Highlands Dr Duluth, MN 55805) is an existing, deliverable address, and the named recipient “Jessica Shultz” could not be associated with the destination address.

16. The same database query inquiry revealed that the return address for the **SUBJECT PARCEL** (6318 N 65 Dr #213 Glendale, AZ 85301) is a valid, deliverable address and the named sender “Jose Flores” could not be associated with the valid return address

17. From my training, personal experience, and the collective experiences related to me by Postal Inspectors who specialize in investigations relating to the mailing of controlled substances, I know it is common for drug traffickers to intentionally leave off the sender’s name and/or the return address, use names not associated with an address, or utilize fictitious names and addresses to evade detection by law enforcement. For instance, I know that when drug traffickers send proceeds relating to the sale of controlled substances back to the source states, it is common for them to send parcels containing cash to

legitimate addresses and even to utilize the appropriate return address, in order to increase the likelihood that the proceeds will be returned to the drug trafficker in the event the parcel is returned to the sender.

CANINE EXAMINATION OF THE SUBJECT PARCEL

18. On May 26, 2022, the **SUBJECT PARCEL** was separated from all other parcels and inspected by my drug detecting canine “Eero” at the Peoria Police Department Public Safety building located at 8351 W Cinnabar Ave Peoria AZ 85345. At approximately 2:20 PM, Eero gave a positive alert to the **SUBJECT PARCEL** by sitting and staring at the **SUBJECT PARCEL**.

19. Eero’s positive alert, sitting and staring at the **SUBJECT PARCEL**, is a “passive” alert that Eero has been trained to give. The passive alert indicates the presence of a controlled substance and/or currency, notes, documents, or other evidence bearing the presence of the odors of a controlled substance within the **SUBJECT PARCEL**.

20. Your Affiant is currently assigned to the handling and care of PPD drug detecting canine Eero. Your Affiant has been a canine handler since August 2009. Eero is a three-year-old German Wirehair Pointer who has been working narcotics detection for PPD since March 2020. Eero and your Affiant currently hold a National Certification in narcotics detection by the National Police Canine Association. This is an annual certification, and we were last certified in February 2022. Your Affiant completed AZ POST Certified K-9 Academy in August 2009 offered by the Phoenix Police Department.

21. Eero has had approximately 140 hours of narcotics detection training on Marijuana, Cocaine, Heroin, and Methamphetamine. Eero and your Affiant attend weekly

in-service training in narcotics detection to maintain proficiency. Eero and your Affiant conducted over 200 successful finds (both training finds or finds which have contributed to active investigations) of controlled substances and/or the proceeds from the sales of controlled substances.

CONCLUSION

22. Based on these facts, there is probable cause to believe that the **SUBJECT PARCEL** described in Paragraph 4 above contains controlled substances or proceeds from the sale of controlled substances, constituting evidence of violations of Title 18, United States Code, Section 1956(h) (Conspiracy to Commit Money Laundering), and Title 21, United States Code, Sections 841(a)(1) (Possession with Intent to Distribute a Controlled Substance); 843(b) (Use of a Communication Facility to Facilitate the Distribution of a Controlled Substance); and 846 (Conspiracy to Distribute a Controlled Substance).

23. This affidavit was sworn telephonically before a United States Magistrate Judge legally authorized to administer an oath for this purpose.

TFO Kevin
Vanderwood

Digitally signed by TFO Kevin
Vanderwood
Date: 2022.05.27 11:30:25
-07'00'

Kevin Vanderwood
Task Force Officer
United States Postal Inspection Service

Subscribed electronically and sworn telephonically on this 27 day of May 2022 at _____.



HONORABLE EILEEN S. WILLETT
United States Magistrate Judge